

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

JONATHAN KING MEYER,

Plaintiff,

No. 1:20-cv-989

v

HON. ROBERT J. JONKER

ALLEGAN COUNTY, STATE OF MICHIGAN,  
KEVIN CRONIN and ROBERT KENGIS, in  
their official and individual capacities,

Defendants.

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Jonathan King Meyer, *In Pro Per*  
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**DEFENDANTS STATE OF MICHIGAN AND ATTORNEY GENERAL DANA  
NESSEL'S MOTION TO DISMISS AMENDED COMPLAINT**

Defendants State of Michigan and Attorney General Dana Nessel move for the dismissal of Plaintiff Jonathan King Meyer's amended complaint pursuant to Fed. R. Civ. Proc. 12(b)(1) and (6), for the reasons that this court lacks jurisdiction, Plaintiff's claims are barred by sovereign immunity and qualified immunity, and he

has failed to state a claim for which relief may be granted. Plaintiff's claims against the State of Michigan are also barred by issue preclusion.

On November 9, 2020, counsel for Defendant contacted Plaintiff via email for concurrence with this motion and concurrence was not granted.

Respectfully submitted,

DANA NESSEL  
Attorney General

s/Bryan W. Beach  
Bryan W. Beach (P69681)  
Assistant Attorney General  
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Dated: November 18, 2020

### **CERTIFICATE OF SERVICE**

I certify that on November 18, 2020, I electronically filed the foregoing document with the Clerk of the Court using the ECF system, which will provide electronic copies to counsel of record, and I certify that my secretary has mailed by U.S. Postal Service the papers to any non-ECF participant.

/s/ Bryan W. Beach  
Bryan W. Beach (P69681)  
Assistant Attorney General